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VIA ECFS

EX PARTE

August 13, 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *WC Docket No. 10-90, Connect America Fund; WC Docket No. 05-337, High-Cost Universal Service Support*

Dear Ms. Dortch:

On August 9, 2012, Eric Einhorn, Senior Vice President, Government Affairs & Strategy at Windstream Corp. (“Windstream”), spoke by telephone with Michael Steffen, legal advisor to Chairman Julius Genachoski. The parties discussed Windstream’s pending Petition for Waiver¹ that, if granted, would permit Windstream to utilize all of its \$60.4 million in allocated Connect America Fund (“CAF”) Phase I support to deploy second-mile fiber to bring broadband to approximately 17,000 unserved locations.

Mr. Steffen asked about the potential, or lack thereof, for the proposed new fiber to enable Windstream to upgrade service in areas already served by an unsubsidized competitor. Mr. Einhorn highlighted the Declaration of Mike Skudin attached to Windstream’s Petition for Waiver,² which describes the methodology by which Windstream identified the locations it would be able to serve with its allocated CAF Phase I support and the costs of such deployments. As noted in the Skudin Declaration, Windstream designed its methodology to prioritize projects with the lowest cost per unserved location, and did not consider underserved locations in its analysis. Windstream excluded from its proposal all carrier serving areas in census blocks that are shown by the National Broadband Map to have fixed broadband coverage, and also eliminated any areas in which Windstream’s planning engineers had personal knowledge of the

¹ Windstream Election and Petition for Waiver, WC Docket Nos. 10-90 and 05-337 (July 24, 2012).

² *Id.* at Attachment 6, ¶¶ 8-12.

presence of broadband competition.³ Finally, Mr. Einhorn noted that in most cases the best way to reach unserved customers in rural areas with robust broadband service is to deploy fiber to remote terminals, which often are located very far outside of town.

Please feel free to contact me if you have any questions.

Sincerely yours,

/s/ Malena F. Barzilai

Malena F. Barzilai

cc: Michael Steffen

³ *See id.*